

## Student Privacy Notice (May 2018)

The University of Nottingham Students' Union is committed to protecting and respecting your privacy. This privacy notice sets out the basis on which any personal data we collect from you will be processed by us. Please read this privacy notice carefully to understand your rights and our views and practices regarding your personal data.

For the purpose of data protection legislation, the controller is the University of Nottingham Students' Union, Portland Building, University Park, Nottingham, NG7 2RD.

This policy is overseen by the Data Protection Manager (“DPM”). If you have any requests or please contact the DPM at OS-SUDataProtection@Nottingham.ac.uk.

### What information do we collect from you?

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us directly. You may do this by filling in forms or by corresponding with us by phone, email or otherwise. Information may be provided by you when you become a member of a club or society in the Students' Union, or when you make purchases with us either in person or online. Additionally, information you enter onto our systems and devices will be stored and processed by us. This will include any emails or other electronic messages and any documents, photos or other files stored on or processed through our systems or devices. Please be aware that by entering information onto these systems you are sharing that information with us.
- **Information we collect throughout our relationship.** We will collect information throughout your relationship with us, for example if you join a student group or sign up to one of our events. We may also receive information about you from third parties e.g. the University and event partners when you have consented to them sharing your information with us.
- **The type of information we collect.** This may include, but is not limited to the following:
  - **Identification information** - name, student identity number, date of birth, gender, nationality, photograph, biometrics.
  - **Contact details** - address, telephone and email address;
  - **Course Information** - course, start date, expected completion date, and mode of study
  - **Financial information** - such as payment card details and bank account details;

- **Equality and Diversity** - You may choose to share information about your health, ethnicity, sexuality or beliefs with us for equality and diversity purposes. This information will be treated as highly confidential;
- **Health** - we may need this information if you are taking part in an activity or event which requires us to seek information about any medical conditions or injuries.
- **Other data** which we may notify you of from time to time.
- **Information we receive from other sources.** We receive information about you from third parties, including:
  - The University of Nottingham - When you enroll on a University of Nottingham accredited course you automatically become a member of the University of Nottingham Students' Union, unless you contact us and tell us otherwise. The University of Nottingham annually shares a register of members with us which includes information about you and your course. When the University gives us this data we become responsible for it and will use this as our core central record of your membership;
  - Event partners;
  - Publicly available resources including online sources;

## Why do we collect this information?

We use this information in the following ways:

- **Information you give to us and that we collect.** We process your Personal Data for the following reasons:
  - On the basis of your **consent or explicit consent**:
    - Where we rely on your consent or explicit permission for processing this will be brought to your attention when the information is collected from you.
  - In our **legitimate interest** for the purpose of:
    - informing you about membership news; events, and services;
    - informing you about our social enterprises (including the SU bar 'Mooch', Portland Coffee Company, Portland Clothing Company, Spar at Portland and Jubilee, and The Print Shop).
    - reimbursing any expenses submitted by you as part of a student group;
    - providing you with advice if you visit the Student Advice Centre.

- monitoring and enforcing compliance with our code of conduct, policies and procedures and applicable law to ensure a compliant workplace;
- carrying out and reviewing surveys and communicating with you generally in our legitimate interest for improving as an organisation and workplace;
- profiling and screening to ensure communications are relevant and timely, in order to provide an improved experience for our members. We do this because it allows us to understand the people who study at the University and it helps us to deliver appropriate services and information to members who need it.
- for our legitimate interest in respect of litigation, including bringing or defending legal claims; and
- accounting and financial planning purposes.

You have the right to object to processing carried out for our legitimate interests. See the [What are your rights?](#) section below for more information.

- To comply with **legal requirements** relating to:
  - the Education Act
  - data protection;
  - tax;
  - health and safety;
  - anti-money laundering;
  - anti-discrimination;
  - mandatory reporting obligations;
  - disclosures required by law enforcement agencies;
  - fraud investigations; and
  - any other legal obligations placed on us from time to time.
- **Information we receive from other sources.** See the 'Who might we share your information with?' section below for details of how we use information in conjunction with third parties.

We may inform you of additional purposes for processing your information when that information is collected from you. We do not sell or share personal details to third parties for the purposes of marketing.

## How long do we keep hold of your information?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of data retention periods:

- Your core membership data is retained for 3 years after the summer in which you leave the University.
- Personal data relating to financial and business transactions with the Union is maintained for 6 years;
- Personal data relating to services provided by the Student Advice Centre are maintained for 6 years;
- Personal data relating to elections is maintained for 1 year.
- Our register of members is retained for 10 years
- Health and safety records are retained for 3 years

In all other cases, we will retain your information for 1 year to establish, exercise or defend legal claims.

Information stored generally on IT systems, such as email history, will be deleted regularly in line with our policies.

## Who might we share your information with?

Where information is shared with third parties we will only share the information required for the purpose it is being shared.

For the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Our sub-processors and service providers including contractors, advisors and agents, details of which can be provided upon request;

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- To third parties when it is necessary for the establishment, exercise or defence of legal claims.
- If we choose to exercise a legal power to do so.

- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply contractual terms or other agreements; or to protect the rights, property, or safety of ourselves our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

## How is your data stored and kept secure?

At the University of Nottingham Students' Union we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on secure servers.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We operate a Data Protection and Information Security Policy for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training. Personal data is password protected and/or secured in dedicated systems to hold the data with access being restricted to only those individuals within the Union who need access. Paper copies containing person data will be kept in a locked filing cabinet and shredded/destroyed at the end of the appropriate retention period **OR** scanned in and immediately shredded/destroyed.

We may transfer your data outside the European Economic Area ("EEA"). We will only do so if adequate protection measures are in place in compliance with data protection legislation. We use the following protection measures:

- transferring to Commission approved countries;
- using Commission approved model contractual clauses;
- requiring companies we transfer data to in the US to be signed up to the appropriate certification e.g. Privacy Shield.

Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access. More information is available by contacting us.

## What are your rights?

You have the following rights. You can exercise these rights at any time by contacting us at University of Nottingham Students' Union, Portland Building, University Park, Nottingham, NG7 2RD OR [OS-SUDataProtection@Nottingham.ac.uk](mailto:OS-SUDataProtection@Nottingham.ac.uk). You have the right:

- to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes.

Where the data is shared with us by a third party we will email you to notify you of this and of our privacy statement. The easiest way to ask us not to send you marketing is to click on the *unsubscribe* link on any marketing email we might send.

- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- where processing of your personal data is based on consent, to withdraw that consent at any time.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object (set out below) and there are no overriding legitimate ground for processing, the data is unlawfully processed, or the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing);
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

## What we ask of you

- **Keeping your information accurate and up to date.** If your information changes for any reason, for example if you change your name, address or bank, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date.
- **Personal data that you provide about another person.** If you provide us with information about another person, you confirm that you have informed

them of our identity, the purposes for which their personal data will be processed and that you have obtained their permission to such processing.

## Definitions

**Personal Data:** Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, identification number, location data or online identifier.

**Special Categories of Data** includes data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## Changes to our privacy policy

This policy may be updated from time to time. You will be notified of any changes to this privacy notice.

## Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to your main point of contact in the Students' Union in the first instance. If you still have queries or concerns or if you are not comfortable discussing with your line manager then you can contact the DPM at [OS-SUDataProtection@Nottingham.ac.uk](mailto:OS-SUDataProtection@Nottingham.ac.uk).